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1 Plaintiff Jacob Sabatino ("Plaintiff") and Defendants Uber Technologies, Inc., Rasier,
2 LLC, Rasier-CA, LLC, Rasier-DC, LLC, and Rasier-PA, LLC ("Defendants"), by and through
3 their undersigned counsel, enter into the following stipulation pursuant to Local Rule 6-2 and
4 subject to the Court's approval for an order postponing the case management conference
5 (currently set for April 15, 2015) and extending the Parties' obligations under Rule 26 (including
6 initial disclosures under Rule 26(a) and the conference of counsel pursuant to Rule 26(f)) pending
7 resolution of Defendants' Motion to Stay Proceedings Pending Arbitration. In support of the
8 instant stipulation, the Parties state as follows:

9 WHEREAS, on January 26, 2015, Plaintiff filed his putative class action complaint against
10 Defendants (Dkt. No. 1);

11 WHEREAS, on February 18, 2015, the Court ordered this case related to *Pappey v. Uber*
12 *Technologies, Inc.* (United States District Court, Northern District of California, San Francisco
13 Division, Case No. 3:15-cv-00064-JST) and *Philliben, et. al v. Uber Technologies, Inc. et. al*
14 (United States District Court, Northern District of California, San Francisco Division, Case No.
15 3:14-cv-05615-JST) (Dkt. No. 23 in Case No. 14-cv-05615-JST);

16 WHEREAS, on March 23, 2015, Defendants filed their Motion to Stay Proceedings
17 Pending Arbitration, with a hearing date of May 21, 2015 (Dkt. No. 27);

18 WHEREAS, the Court has set a date of April 15, 2015 for the initial case management
19 conference in this matter, and the Parties' joint case management statement is currently due April
20 1, 2015 (Dkt. No. 25);

21 WHEREAS, the deadline for the conference of parties pursuant to Rule 26(f) is currently
22 scheduled for March 25, 2015, which is 21 days prior to the case management conference;

23 WHEREAS, the Parties desire to conserve resources pending resolution of the Motion to
24 Stay Proceedings Pending Arbitration, including by postponing the case management conference
25 and associated deadlines, and by extending upcoming discovery deadlines and obligations under
26 Rule 26;

27 WHEREAS, for the reasons set forth herein, good cause exists to extend the dates
28 requested herein;

NOW, THEREFORE, IN CONSIDERATION OF THE FOREGOING, IT IS HEREBY STIPULATED by and between the Parties, that subject to Court approval the following deadlines be adjusted as follows: (i) the case management conference currently scheduled for April 15, 2015, shall be rescheduled to 2:00 p.m. on the fifth Wednesday following the Court's ruling on Defendants' Motion to Stay Proceedings Pending Arbitration (or as soon thereafter as the Court is available), and all associated deadlines (including the joint case management statement deadline) shall be rescheduled accordingly; (ii) the Parties' deadlines to act under Rule 26, including the conference of the parties pursuant to Rule 26(f) and initial disclosures under Rule 26(a), shall be extended and all discovery stayed, and the Parties shall conduct the Rule 26(f) conference at least 21 days before the rescheduled case management conference.

IN THE ALTERNATIVE, if the Court prefers that the case management conference proceed as scheduled on April 15, 2015, the Parties request that the deadline for initial disclosures under Rule 26(a), and all other discovery, be stayed until 28 days after the Court rules on the Motion to Stay Proceedings Pending Arbitration.

IT IS SO STIPULATED.

Dated: March 24, 2015

IRELL & MANELLA LLP

By: /s/ A. Matthew Ashley

Andra B. Greene
A. Matthew Ashley
Justin N. Owens
Attorneys for Defendants

Dated: March 24, 2015

MLG AUTOMOTIVE GROUP, APLC

By: /s/ Kathryn Harvey

Kathryn Harvey
Attorneys for Plaintiff

PURSUANT TO STIPULATION, THE COURT ORDERS AS FOLLOWS:

[(i) The case management conference currently scheduled for April 15, 2015, is hereby rescheduled to 2:00 p.m. on the fifth Wednesday following the Court's ruling on Defendants' Motion to Stay Proceedings Pending Arbitration (or as soon thereafter as the Court is available), and all associated deadlines (including the joint case management statement deadline) shall be rescheduled accordingly; and (ii) the Parties' deadlines to act under Rule 26, including the conference of the parties pursuant to Rule 26(f) and initial disclosures under Rule 26(a), shall be extended and all discovery stayed, and the Parties shall conduct the Rule 26(f) conference at least 21 days before the rescheduled case management conference.]

OR,

[The Parties' deadline for initial disclosures under Rule 26(a), and all other discovery, is stayed until 28 days after the Court rules on the Motion to Stay Proceedings Pending Arbitration.]

Dated: _____

Honorable Jon S. Tigar
United States District Judge

ECF ATTESTATION

I, Justin N. Owens, am the ECF user whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER EXTENDING DATES FOR CASE MANAGEMENT CONFERENCE AND RULE 26 OBLIGATIONS PENDING DEFENDANT'S MOTION TO STAY PROCEEDINGS PENDING ARBITRATION. I hereby attest that I received authorization to insert the signatures indicated by a conformed signature (/s/) within this e-filed document.

By: /s/ Justin N. Owens

Justin N. Owens